

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KASHMAN HARRIS		Hon. John M. Gallagher, U.S.D.J.
		:
Plaintiff,		CIVIL ACTION
		:
v.		No. 21-1636-JMG
		:
SKIPPACK EMERGENCY MEDICAL		:
SERVICES, INC.		:
		:
Defendant.		:
		:

**STIPULATION TO PERMIT PLAINTIFF TO FILE A  
FIRST AMENDED COMPLAINT PURSUANT TO FED R.CIV.P. 15**

The Parties in the above-captioned matter hereby stipulate as follows:

1. Plaintiff is permitted to file a First Amended Complaint in the form attached hereto, and that the First Amended Complaint shall be deemed filed as of the date the First Amended Complaint is filed following Court approval of this Stipulation;
  
2. Defendant reserves all rights with respect to the merits of the claims set forth in Plaintiff's First Amended Complaint and nothing herein shall be construed as a waiver of any defenses or arguments with respect thereto by Defendant, including but not limited to jurisdiction, statute of limitations, and failure to exhaust administrative remedies;
  
3. Defendant shall have thirty (30) days from the date Plaintiff's First Amended Complaint is filed to file an Answer or otherwise move in response to Plaintiff's First Amended Complaint.

/s/ Adam C. Lease  
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*Attorneys for Defendant*

APPROVED and SO ORDERED:

Dated: 7/02/2021

/s/ John M. Gallagher  
Hon. John M. Gallagher, U.S.D.J.